

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
DAVID MATTHEW BANKS	:	
ANA ESTHER BANKS	:	CASE NO. 1:16-bk-04203
fka Ana Esther Velazquez	:	
Debtors	:	
	:	
WELLS FARGO BANK, NA, d/b/a Wells	:	
Fargo Auto,	:	
Movant	:	
v.	:	
	:	
DAVID MATTHEW BANKS	:	
ANA ESTHER BANKS	:	
fka Ana Esther Velazquez,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Proof of value of collateral is demanded at trial and this paragraph is therefore denied.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Proof of default is demanded at trial and this paragraph is therefore denied.

13. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
14. Denied that Movant is entitled to relief.
15. a. Denied that Movant lacks adequate protection. By its own estimates, there is equity in the collateral.
b. Denied that Movant lacks adequate protection. By Movant's own estimates, there is equity in the collateral. The vehicle is the Debtor's mode of transportation and is essential to the reorganization.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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